

BILL OF COMPLAINT

Catherine D. Routzahn, Fern O. Day, James G. Oland, and Jean O. Crone, Plaintiffs, by James C. Hubbard and Frank Martz, their attorneys, bring this Bill of Complaint against Margaret Oland, Elaine Hemby, Carol Shreve, Bruce Oland, June O. Best and Nell O. Miller, Defendants, and as grounds therefor state:

1. That Plaintiffs and Defendants are all of the owners as tenants in common of the "Charles D. Oland farm" located in Buckeystown District, Frederick County, State of Maryland, and containing approximately 150 acres of land plus improvements.

2. That the real estate in question is more fully described in the following two deeds: (1) A deed from Dollie G. Harwood to Charles D. Oland and Mamie G. Oland, his wife, dated September 16, 1929, and recorded among the Land Records for Frederick County, Maryland, in Liber 372, folio 139, a copy of which is attached hereto and incorporated herein as Plaintiffs' Exhibit "A"; and, (2) A deed from Charles E. Shipe and Lucy Shipe, his wife, to Charles D. Oland, and Mamie G. Oland, his wife, dated March 26, 1924, and recorded among the Land Records for Frederick County, Maryland, in Liber 348, folio 68, a copy of which is attached hereto and incorporated herein as Plaintiffs' Exhibit "B".

3. That Mamie G. Oland died in April of 1942 and Charles D. Oland subsequently married Delma P. Oland.

4. That Charles D. Oland died on August 23, 1953, seized and possessed of the land described in Plaintiffs' Exhibits "A" and "B" which is approximately a 150 acre farm.

5. That Charles D. Oland died with a Last Will and Testament which was probated in Frederick County, Maryland, in Estate No. 5519 (a copy of said Will is attached hereto and incorporated herein as Plaintiffs' Exhibit "C").

6. That by the terms of the Will of Charles D. Oland his widow, Delma P. Oland, was given a life estate in the farm in question and Delma P. Oland died in 1976 or 1977.

NIER, JARRELL
& HUBBARD
ATTORNEYS-AT-LAW
DENTON, MARYLAND

21629

TELEPHONE 478-2112